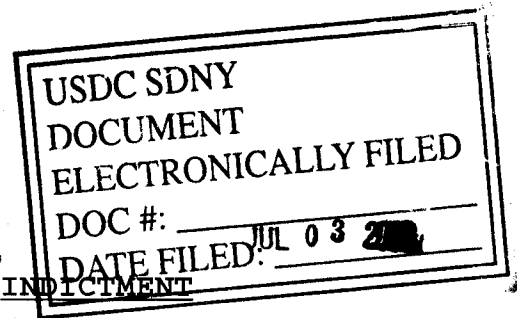


JUDGE LYNCH

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



- - - - -X

UNITED STATES OF AMERICA :

- v. - :

THOMAS VALDEZ JR., : 08 Cr.

Defendant. :

- - - - -X

08 CRIM 618

COUNT ONE

The Grand Jury charges:

1. From at least January 2008 through and including June 2008, in the Southern District of New York and elsewhere, THOMAS VALDEZ JR., the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 1956(a)(1)(B)(I) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that THOMAS VALDEZ JR., the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfer of approximately two hundred twenty thousand dollars in cash, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics

transactions, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(I).

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

3. As a result of committing the money-laundering offense alleged in Count One of this Indictment, THOMAS VALDEZ JR., the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(A), any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment.

Substitute Assets Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of THOMAS VALDEZ JR., the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

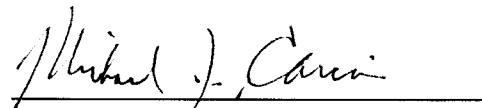
(d) has been substantially diminished in value;
or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 981, to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981).


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

THOMAS VALDEZ JR.,

Defendant.

INDICTMENT

08 Cr.

(18 U.S.C. §§ 1956(h))

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Keith Miller
Foreperson.

7/8/08 - Fld. Indictment case assigned to
Judge Lynch.

Eaton, J. U.S.M.G.H